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ATTORNEY FOR HUMANA INSURANCE COMPANY

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	
	§	
<b>REVOLUTION MONITORING, LLC</b>	§	CASE NO. 18-33730-hdh
	§	
<b>REVOLUTION MONITORING MANAGEMENT LLC,</b>	§	CASE NO. 18-33731-hdh
	§	
<b>REVOLUTION NEUROMONITORING LLC</b>	§	CASE NO. 18-33732-hdh
	§	
<b>Debtors.</b>	§	(Jointly Administered)

**HUMANA INSURANCE COMPANY’S OBJECTION TO THE MOTION OF  
LIQUIDATING TRUSTEE FOR RULE 2004 EXAMINATION**

Humana Insurance Company (hereinafter, “Humana”), by and through their undersigned attorney, hereby objects to the Motion of Liquidating Trustee for Rule 2004 Examination (“Motion”) (ECF No. 147) for the following reasons:

**I. OBJECTIONS**

The Motion and attached subpoena requests are overly broad and place an unreasonable burden on Humana. Production of the requested documents would violate the Health Insurance Portability and Accountability Act (“HIPAA”) Standards for privacy of Individually Identifiable

Health Information. Additionally, production of the requested documents exceeds the permissible scope of a subpoena and would cause Humana to incur undue burden and expense. Moreover, much of the information sought by the subpoena is in the possession of the debtors.

UnitedHealth Group Incorporated (ECF No. 154), Cigna (ECF No. 162), Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. (ECF. 167), and Liberty Mutual Insurance Company (ECF No. 168) have filed various objections to the Motion. The arguments made in support of these interested parties' objections also support Humana's objections. Therefore, Humana further incorporates by reference the arguments contained in the objections filed by UnitedHealth Group Incorporated, Cigna, Blue Cross and Blue Shield of Massachusetts HMO Blue, Inc. and Liberty Mutual as if asserted in full herein. *See* Fed. R. Bankr. P. 7010; Fed. R. Civ. P. 10(c).

## **II. PRAYER**

Based on the foregoing, Humana respectfully requests that the Court deny the Motion, and grant Humana such other relief that the Court deems just and proper.

Respectfully submitted,

/s/ Ammar Dadabhoy  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 17, 2019, a copy of the foregoing was served on all counsel of record herein by the Court's ECF notification system.

/s/ Ammar Dadabhoy  
Ammar Dadabhoy